

John Metsker, Esq. SBN 268977
THE METSKER LAW FIRM
P.O. Box 590881
San Francisco, CA 94159
Phone: 866-342-6180
Fax: 415-500-4081
jmetsker@metskerlaw.com
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ANTHONY J. LEWIS,

Plaintiff,

v.

COMMISSIONER OF SOCIAL
SECURITY,

Defendant.

Case No. 2:24-cv-01608-SCR

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER FOR
EXTENSION OF TIME FOR
PLAINTIFF TO FILE
MOTION FOR SUMMARY
JUDGMENT**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the deadline for Plaintiff to file his Motion for Summary Judgment shall be extended from September 4, 2024 to **September 19, 2024**. In support of this request, Plaintiff's counsel states as follows:

1. This is plaintiff's first request for an extension in this matter.
2. Plaintiff's Motion for Summary Judgment is currently due September 4, 2024.
3. Good cause exists for this request, as Plaintiff's counsel currently has an unusually heavy workload and requires additional time to fully brief the complex issues raised in this case.

4. Plaintiff's counsel is a true solo attorney that has no staff to assist him in the day-to-day operation of his law firm or assist him with the briefing of cases.

5. Plaintiff's counsel makes this request in good faith with no intention of unduly delaying these proceedings.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: September 2, 2024

/s/ John D. Metsker
JOHN D. METSKER
Attorney for Plaintiff

Dated: September 3, 2024

/s/ Justin L. Martin*
JUSTIN L. MARTIN
Special Assistant U.S. Attorney
Office of Program Litigation, Office 7
(*as authorized by email on September 3, 2024)
Attorney for Defendant

[PROPOSED] ORDER:

Pursuant to the agreement of the parties, and good cause being found, the deadline for Plaintiff to file his Motion for Summary Judgment shall be extended to September 19, 2024.

APPROVED AND SO ORDERED.

Dated: September 6, 2024


SEAN C. RIORDAN
UNITED STATES MAGISTRATE JUDGE